



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

October 19, 2018

VIA ECF

The Honorable Joan N. Erickson
District Judge, District of Minnesota
United States District Court
12W U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415

RE: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 15-2666-JNE-FLN

Dear Judge Erickson:

I am writing regarding Defendants' Fifteenth Motion to Dismiss for Failure to Comply with Pretrial Order No. 14 (Dkt. No. 1538). At yesterday's hearing, ruling on the Motion was withheld as to *Edwards v. 3M Co., et al.* (17-cv-04891), *Johnson v. 3M Co., et al.* (17-cv-05270), and *Billings v. 3M Co., et al* (17-cv-05277), pending the Court's finding as to whether Plaintiffs' amended PFSs were served with improper copies (re-dated) of prior verification pages. As requested, the following documents are attached for the Court's review:

- Exhibit A1 is a true and correct copy of the verification page (dated May 19, 2018) served with the PFS for *Edwards* (17-cv-04891) on August 7, 2018.
- Exhibit A2 is a true and correct copy of the verification page (re-dated September 7, 2018) served with the most-recent PFS for *Edwards* (17-cv-04891) on September 11, 2018. Defendants assert that this is a photocopy of Exhibit A1 with the original date whited out.
- Exhibit B1 is a true and correct copy of the verification page (dated April 30, 2018) served with the PFS for *Johnston* (17-cv-05270) on August 7, 2018.
- Exhibit B2 is a true and correct copy of the verification page (re-dated September 7, 2018) served with the most-recent PFS for *Johnston* (17-cv-05270) on September 11, 2018.

The Honorable Joan N. Ericksen

October 19, 2018

Page 2

Defendants assert that this is a photocopy of Exhibit B1 with the original date and second signature block whited out.

- Exhibit C1 is a true and correct copy of the verification page (dated April 29, 2018) served with the PFS for *Billings* (17-cv-05277) on August 7, 2018.
- Exhibit C2 is a true and correct copy of the verification page (re-dated September 7, 2018) served with the most-recent PFS for *Billings* (17-cv-05277) on September 11, 2018. Defendants assert that this is a photocopy of Exhibit C1 with the original date and second signature block whited out.

Sincerely,

s/Benjamin W. Hulse

Benjamin W. Hulse

Attachments